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FILED

Clerk

District Court

JAN 12 2006

For The Northern Mariana Islands

By _____

(Deputy Clerk)

6 **DAVID J. LUJAN, ESQ.**

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11 *Attorneys for Defendant World Corporation*

12 **UNITED STATES DISTRICT COURT**

13 **FOR THE NORTHERN MARIANA ISLANDS**

14
15 YU SUK CHUNG,

16 Plaintiff,

17 vs.

18 WORLD CORPORATION,

19 Defendant.

CIVIL CASE NO. **04-00001**

**DEFENDANT'S EMERGENCY MOTION
FOR AN ORDER DISCHARGING
COUNSEL AND STAYING PROCEEDINGS**

**Emergency Motion Under Local Rule
7.1.h.3(b)**

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)

Defendant World Corporation brings this emergency motion before the Court to address the issue of the withdrawal and discharge of its current counsel of record. World Corporation asks that the Court address the issue of World Corporation's representation in this case on an emergency basis because of (1) the necessity of its current counsel to withdraw, (2) impending deadlines for filing briefs, and a hearing on February 16, 2006 on certain pending post-judgment motions; and (3) the new trial scheduled to begin in approximately 3 months.

The telephone numbers and office addresses of opposing counsel are as follows:

Colin M. Thompson, Esq.
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Opposing counsel, Mr. Thompson, was served with a copy of this motion and was notified by telephone of its filing, as well as the time that the Court has set for the hearing on the motion.

Dated: January 12, 2006.

MATTHEW T. GREGORY, ESQ.
DAVID J. LUJAN, ESQ.
IGNACIO C. AGUIGUI, ESQ.

By: 

MATTHEW T. GREGORY, ESQ.

MOTION

Defendant WORLD CORPORATION hereby applies for an Order discharging MATTHEW T. GREGORY, DAVID J. LUJAN, and IGNACIO C. AGUIGUI, as counsel of record for World Corporation in this matter. Counsel have concluded their agreement to represent World Corporation and no further agreements have been executed regarding counsel's representation in this matter. World Corporation consents to their discharge as indicated in the concurrently submitted Notices and Consents Regarding Withdrawal of Counsel and [Proposed] Order Discharging Counsel.

Furthermore, in light of the need for World Corporation to identify and secure new counsel in this appeal and the time that will be required for that task, World Corporation also asks the Court for a reasonable stay of further proceedings and deadlines in this appeal. World Corporation will promptly advise the Court when it has secured new counsel.

Dated: January 11, 2006.

MATTHEW T. GREGORY, ESQ.
DAVID J. LUJAN, ESQ.
IGNACIO C. AGUIGUI, ESQ.

By: 

MATTHEW T. GREGORY, ESQ.